

HEATHER E. WILLIAMS, #122664  
Federal Defender  
RACHELLE BARBOUR, #185395  
Assistant Federal Defender  
OFFICE OF THE FEDERAL DEFENDER  
801 I Street, 3<sup>rd</sup> Floor  
Sacramento, CA 95814  
Tel: 916-498-5700/Fax: 916-498-5710

Attorney for Defendant  
XAVIER ROBERTS

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No: 2:24-CR-0309-WBS
	)	
Plaintiff,	)	
	)	STIPULATION AND ORDER TO CONTINUE
vs.	)	STATUS CONFERENCE AND EXCLUDE
	)	TIME
XAVIER ROBERTS,	)	
	)	District Judge William B. Shubb
Defendant.	)	New Date: August 4, 2025
	)	Time: 10:00 a.m.

IT IS HEREBY STIPULATED and requested by and between the parties through their respective counsel, HEIKO COPPOLA, Assistant United States Attorney, attorney for the UNITED STATES, and RACHELLE BARBOUR, attorney for Defendant XAVIER ROBERTS, that the status conference currently set for Monday, June 30, 2025, be continued to Monday, **August 4, 2025 at 10:00 a.m.**, and that time be excluded for preparation of counsel.

The Government has provided hundreds of documents and dozens of video files for Defense counsel's review in this case. Since the start of the case, Defense counsel has been reviewing and analyzing the above, conducting legal research, meeting with her client, and otherwise preparing for trial. The above tasks are ongoing, and the defense requires additional time to review discovery, discuss the case with her client and the Government, and continue to prepare. The parties expect to finalize a plea agreement in the additional time and provide it to the Court for its review. The parties believe that failure to grant the requested continuance

would deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

Accordingly, the parties stipulate and request that the Court exclude time between the date of the filing of this stipulation through the new status conference date of August 4, 2025, under 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4). The parties agree that the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

Date: June 17, 2025

HEATHER E. WILLIAMS  
Federal Defender

/s/ Rachelle Barbour  
RACHELLE BARBOUR  
Attorney for Defendant  
XAVIER ROBERTS

Date: June 17, 2025

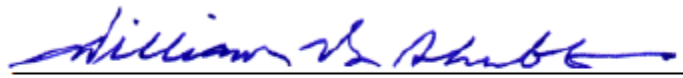
MICHELE BECKWITH  
Acting United States Attorney

/s/ Heiko Coppola  
HEIKO COPPOLA  
Assistant U.S. Attorney  
Attorney for the United States

## ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

Dated: June 18, 2025

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE